



MAJOR SOURCE OPERATING PERMIT

Permittee: **IIG MinWool LLC**

Facility Name: IIG MinWool LLC

Facility No.: 211-0013

Location: Phenix City, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, <u>Ala. Code</u> §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, <u>Ala. Code</u> §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

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Modification Date: DRAFT

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Fede	erally Enforceable Provisos	Regulations
1.	Transfer	
	This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code R. 335-3-1613(1)(a)5.	ADEM Admin. Code R. 335-3-1602(6)
2.	Renewals	
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code R. 335-3-1612(2)
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3.	Severability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code R. 335-3-1605(e)
4.	<u>Compliance</u>	
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code R. 335-3-1605(f)

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	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code R. 335-3-1605(g)
5.	<u>Termination for Cause</u>	
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code R. 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code R. 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	ADEM Admin. Code R. 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code R. 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness:	
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the	ADEM Admin. Code R. 335-3-1607(a)

ADEM Admin. Code R. 335-3-1607(b)
ADEM Admin. Code R. 335-3-1607(c)
ADEM Admin. Code R. 335-3-1607(e)

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		(2)	The compliance status;	
		(3)	The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-1605(c) (Monitoring and Recordkeeping Requirements);	
		(4)	Whether compliance has been continuous or intermittent;	
		(5)	Such other facts as the Department may require to determine the compliance status of the source;	
	(b)	The	compliance certification shall be submitted to:	
	Alal		Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13.	Reo	pening	for Cause	
		_	of the following circumstances, this permit will be rior to the expiration of the permit:	ADEM Admin. Code R. 335-3-1613(5)
	(a)	Air A with year than appl requ	tional applicable requirements under the Clean Act of 1990 become applicable to the permittee a remaining permit term of three (3) or more s. Such a reopening shall be completed not later a eighteen (18) months after promulgation of the icable requirement. No such reopening is irred if the effective date of the requirement is than the date on which this permit is due to re.	
	(b)	requ sour	tional requirements (including excess emissions irements) become applicable to an affected ce under the acid rain program. Upon approval ne Administrator, excess emissions offset plans	

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		shall be	deemed to be incorporated into this permit.	
	(c)	contains statemen	artment or EPA determines that this permit a material mistake or that inaccurate nts were made in establishing the emissions ds or other terms or conditions of this permit.	
	(d)	this perr	ninistrator or the Department determines that mit must be revised or revoked to assure nce with the applicable requirements.	
14.	<u>Addi</u>	tional AD	EM Admin. Code R.s and Regulations	
	and even are a	Regulation t additiona dopted, it	assued on the basis of ADEM Admin. Code R.s. as existing on the date of issuance. In the al ADEM Admin. Code R.s and Regulations shall be the permit holder's responsibility to ach ADEM Admin. Code R.s.	§22-28-16(d), Code of Alabama 1975, as amended
15.	<u>Equi</u>	pment Ma	aintenance or Breakdown	
	(a)	equipme issued b mainten equipme twenty-fo shutdow the shut intended	ase of shutdown of air pollution control ent (which operates pursuant to any permit by the Director) for necessary scheduled ance, the intent to shut down such ent shall be reported to the Director at least our (24) hours prior to the planned en, unless such shutdown is accompanied by adown of the source which such equipment is at to control. Such prior notice shall include, out limited to the following:	ADEM Admin. Code R 335-3-107(1), (2)
		Ol	lentification of the specific facility to be taken ut of service as well as its location and permit umber;	
		po	ne expected length of time that the air ollution control equipment will be out of ervice;	
		cc	ne nature and quantity of emissions of air ontaminants likely to occur during the nutdown period;	
		ec	easures such as the use of off-shift labor and quipment that will be taken to minimize the ngth of the shutdown period;	
			ne reasons that it would be impossible or appractical to shut down the source operation	

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			during the maintenance period.	
	(b)	or up is exp conta stand shall work pertine	e event that there is a breakdown of equipment set of process in such a manner as to cause, or pected to cause, increased emissions of air aminants which are above an applicable lard, the person responsible for such equipment notify the Director within 24 hours or the next ing day and provide a statement giving all nent facts, including the estimated duration of reakdown. The Director shall be notified when reakdown has been corrected.	
16.	<u>Ope</u> :	ration o	of Capture and Control Devices	
	whice oper emission the a	th this pated at a sions oabove ed	tion control devices and capture systems for bermit is issued shall be maintained and all times in a manner so as to minimize the f air contaminants. Procedures for ensuring that quipment is properly operated and maintained so ize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
17.	<u>Obn</u>	oxious	<u>Odors</u>	
	obnoverif odor the	oxious of the coust em Alabama these n	is issued with the condition that, should odors arising from the plant operations be air Division inspectors, measures to abate the issions shall be taken upon a determination by a Department of Environmental Management neasures are technically and economically	ADEM Admin. Code R. 335-3-108
18.	Fugi	tive Du	<u>ist</u>	
	(a)	eman	nutions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ns, dryers, hoppers, ductwork, etc.	ADEM Admin. Code R. 335-3-402
	(b)	in the airbo follov	or haul roads and grounds will be maintained e following manner so that dust will not become rne. A minimum of one, or a combination, of the ving methods shall be utilized to minimize rne dust from plant or haul roads and grounds:	
		(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of	

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		wind or vehicular traffic;			
	(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;			
	(3)	By paving;			
	(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;			
	adequately and ground exclusively control tech	, or a combination, of the above methods fail to reduce airborne dust from plant or haul roads is, alternative methods shall be employed, either or in combination with one or all of the above aniques, so that dust will not become airborne. methods shall be approved by the Department ization.			
19.	Additions a	and Revisions			
	modification	cations to this source shall comply with the procedures in ADEM Admin. Code R.s 335-3-35-3-1614.	ADEM Admin. Code R 335-3-1613 and .14		
20.	Recordkee	ping Requirements			
	1 1	rds of required monitoring information of the ce shall include the following:	ADEM Admin. Code R 335-3-1605(c)2.		
	(1)	The date, place, and time of all sampling or measurements;			
	(2)	The date analyses were performed;			
	(3)	The company or entity that performed the analyses;			
	(4)	The analytical techniques or methods used;			
	(5)	The results of all analyses; and			
			1		

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	(b)	Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21.	Rep	orting Requirements	
	(a)	Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-1604(9).	ADEM Admin. Code R. 335-3-1605(c)3.
	(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22.	<u>Emi</u>	ssion Testing Requirements	
	prov safe acco 40 o	n point of emission which requires testing will be rided with sampling ports, ladders, platforms, and other ty equipment to facilitate testing performed in ordance with procedures established by Part 60 of Title of the Code of Federal Regulations, as the same may be nded or revised.	ADEM Admin. Code R. 335-3-105(3) and ADEM Admin. Code R. 335-3-104(1)
	in ac subi	Air Division must be notified in writing at least 10 days dvance of all emission tests to be conducted and mitted as proof of compliance with the Department's air ation control ADEM Admin. Code R.s and regulations.	
		void problems concerning testing methods and edures, the following shall be included with the	

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	notif	ication letter:	
	(1)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	ADEM Admin. Code R. 335-3-104
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
	(3)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(4)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
	owne and	etest meeting may be held at the request of the source er or the Air Division. The necessity for such a meeting the required attendees will be determined on a case-by- basis.	ADEM Admin. Code R. 335-3-104
	30 d	est reports must be submitted to the Air Division within ays of the actual completion of the test unless an asion of time is specifically approved by the Air Division.	
23.	<u>Payr</u>	ment of Emission Fees	
		ual emission fees shall be remitted each year according e fee schedule in ADEM Admin. Code R. 335-1-704.	ADEM Admin. Code R. 335-1-704
24.	<u>Othe</u>	er Reporting and Testing Requirements	
	fuel a may pollu	mission of other reports regarding monitoring records, analyses, operating rates, and equipment malfunctions be required as authorized in the Department's air ation control ADEM Admin. Code R.s and regulations. Department may require emission testing at any time.	ADEM Admin. Code R. 335-3-104(1)

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25.	Title VI Rec	quirements (Refrigerants)	
	including air Class II ozor 82, Subpart and maintai practices, pe	having appliances or refrigeration equipment, r conditioning equipment, which use Class I or ne-depleting substances as listed in 40 CFR Part A. Appendices A and B, shall service, repair, in such equipment according to the work ersonnel certification requirements, and certified ad recovery equipment specified in 40 CFR Part E.F.	40 CFR 82
	Class I or Cl the repair, s	hall knowingly vent or otherwise release any lass II substance into the environment during servicing, maintenance, or disposal of any device rovided in 40 CFR Part 82, Subpart F.	
	recordkeepii	sible official shall comply with all reporting and ing requirements of 40 CFR 82.166. Reports omitted to the US EPA and the Department as	
26.	Chemical A	accidental Prevention Provisions	
	present in a	Il listed in Table 1 of 40 CFR Part 68.130 is process in quantities greater than the threshold ted in Table 1, then:	40 CFR Part 68
	1 1	owner or operator shall comply with the sions in 40 CFR Part 68.	
	(b) The o	wner or operator shall submit one of the ring:	
	(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,	
	(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27.	Display of I	<u>Permit</u>	
	at the site w	shall be kept under file or on display at all times where the facility for which the permit is issued is will be made readily available for inspection by	ADEM Admin. Code R 335-3-1401(1)(d)

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	any or all persons who may request to see it.	
28.	Circumvention	
	No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 ADEM Admin. Code R.s and regulations.	ADEM Admin. Code R. 335-3-110
29.	Visible Emissions	
	Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	ADEM Admin. Code R. 335-3-401(1)
30.	Fuel-Burning Equipment	
	(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-403.	ADEM Admin. Code R. 335-3-403
	(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-501.	
	the chissions specified in Part 555 5 5.01.	ADEM Admin. Code R. 335-3-501
31.	Process Industries – General	
	Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-404.	ADEM Admin. Code R. 335-3-404
32.	Averaging Time for Emission Limits	
	Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the	ADEM Admin. Code R.

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nominal time required by the specific test method.	335-3-105
33. Compliance Assurance Monitoring (CAM)	40 CFR 64
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) <i>Proper maintenance</i> . At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are	

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are not malfunctions.	

- (4) Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of

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	ng monitoring and collecting data, or the ag of additional parameters.	
(b) Qualit	y Improvement Plan (QIP) Requirements	40 CFR 64.8
33(a)(4)(b authority implement permit made accumulate percent doperating implement higher or purposes emissions	the results of a determination made under Section above, the Administrator or the permitting may require the owner or operator to develop and it a QIP. Consistent with 40 CFR §64.6(c)(3), the ay specify an appropriate threshold, such as an ition of exceedances or excursions exceeding 5 uration of a pollutant-specific emissions unit's time for a reporting period, for requiring the itation of a QIP. The threshold may be set at a lower percent or may rely on other criteria for of indicating whether a pollutant-specific unit is being maintained and operated in a onsistent with good air pollution control practices.	
) Elements		
, (a)	The owner or operator shall maintain a written QIP, if required, and have it available for inspection.	
(b)	The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:	
	i. Improved preventive maintenance practices.	
	ii. Process operation changes.	
	iii. Appropriate improvements to control methods.	
	iv. Other steps appropriate to correct control performance.	
	v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).	

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	implement notify the improvem	required, the owner or operator shall develop and t a QIP as expeditiously as practicable and shall Department if the period for completing the ents contained in the QIP exceeds 180 days from n which the need to implement the QIP was d.	
, ,	determina Departme	implementation of a QIP, upon any subsequent tion pursuant to Section 33(a)(4)(b) above, the nt may require that an owner or operator make e changes to the QIP if the QIP is found to have:	
	(a)	Failed to address the cause of the control device performance problems; or	
	(b)	Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.	
	operator o emission l testing, re apply und	tation of a QIP shall not excuse the owner or f a source from compliance with any existing imitation or standard, or any existing monitoring, porting or recordkeeping requirement that may er federal, state, or local law, or any other requirements under the Act.	
	(c) Report	ting and Recordkeeping Requirements	40 CFR 64.9
(1)	General re	eporting requirements	
	(a)	On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-1605(c)3.	
	(b)	A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-1605(c)3. and the following information, as applicable:	

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i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
 ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and 	
 iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. (2) General recordkeeping requirements. 	
 (a) The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code R. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). (b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. 	

Federally Enforceable Provisos	Regulations
(d) Savings Provisions	40 CFR 64.10
(1) Nothing in this part shall:	
a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
b. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.	
c. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	

Summary Page for #1 Mineral Wool Cupola Furnace and Fiber Formation Collection Process

Permitted Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
Stack 101	Environtech #1, Filterhouse #1	PM	117 lb/hr*	335-3-1404(9) BACT
Stack 101	Environtech #1, Filterhouse #1	СО	16.7 lb/hr**	335-3-1404(9) BACT
Stack 101	Environtech #1, Filterhouse #1	NO_x	15.0 lb/hr**	335-3-1404(9)BACT
Stack 101	Environtech #1, Filterhouse #1	H2S	1.0 lb/hr**	335-3-1404(9) BACT
Stack 101	Environtech #1, Filterhouse #1	SO ₂	88.5 lb/hr**	335-3-1404(9) BACT
Stack 101	Environtech #1, Filterhouse #1	PM	0.1 lb/ton of melt **	§63.1178(a)(1) Subpart DDD

^{*} combined particulate matter (PM) emissions from the Cupola, Fiber Formation/Collection Process, Mineral Wool Process (Board Line), and Mineral Wool Process (Pipe Insulation Line)

^{**}Limits associated with only the cupola furnace

Provisos for #1 Mineral Wool Cupola Furnace and Fiber Formation Collection Process

Fe	derally Enforceable Provisos	Regulations
Ap	plicability	
1.	The cupola furnace and fiber collection are subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2.	The cupola furnace and fiber collection are subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-401(1)
3.	The cupola furnace has enforceable limits in place in order to comply with the applicable provisions of ADEM Admin. Code R. 335-3-1404. "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404
4.	The cupola is subject to the applicable requirements of 40 CFR 63 Subpart DDD, "National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production".	ADEM Admin. Code R. 335-3-1106(55) [§ 63.1178]
5.	The cupola is subject to the applicable requirements of 40 CFR 63 Subpart A, "General Provisions", as listed in Table 1 in Subpart DDD in 40 CFR Part 63.	ADEM Admin. Code R. 335-3-1106(55) [§ 63.1178]
6.	This cupola is subject to 40 CFR 64, "Compliance Assurance Monitoring." Pre-control potential carbon monoxide emissions exceed 100 TPY.	40 CFR Part 64
<u>En</u>	nission Standards	
1.	Visible emissions (VE) these units shall not exceed the opacity limitations as specified in General Proviso No. 29.	ADEM Admin. Code R. 335-3-401(1)
2.	The combined particulate matter (PM) emissions from the Cupola, Fiber Formation/Collection Process, Mineral Wool	ADEM Admin. Code R. 335-3-1404(9)
	Process (Board Line), and Mineral Wool Process (Pipe Insulation Line) shall not exceed 117.0 (lb/hr) pounds per hour.	BACT
3.	Particulate matter (PM) emissions from each existing, new, or reconstructed cupola shall not exceed 0.05 kilograms (kg) of	ADEM Admin. Code R. 335-3-1106(55)
	PM per megagram (MG) (0.10 pound [lb] of PM per ton) of melt.	[§63.1178(a)(1)]
4.	The Permittee must comply with these standards (Subpart DDD) at all times except during periods of startup, shutdown,	ADEM Admin. Code R. 335-3-1106(55)
	or malfunction.	[§63.1180]

Fee	derally Enforceable Provisos	Regulations
5.	The pressure drop across each baghouse shall not drop below 0.2 inches W. C. while the source of pollution to the baghouse	ADEM Admin. Code R. 335-3-1404(9)
	is operating.	BACT
6.	The three-hour average temperature in the firebox of the thermal oxidizer on the cupola shall not be less than 1320°F	ADEM Admin. Code R. 335-3-1404(9)
	while the cupola is operating.	BACT
7.	Sulfur dioxide emissions from the #1 cupola shall not exceed 88.5 pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
8.	Carbon monoxide emissions from the #1 cupola shall not exceed 16.7 pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
9.	Nitrogen oxides emissions from the #1 cupola shall not exceed 15.0 pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
10.	Hydrogen sulfide emissions from the #1 cupola shall not exceed 1.0 pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
11.	Only coke derived from coal shall be used as fuel. Such coke shall not contain sulfur which exceeds 0.7% by weight.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
12.	The cupola shall be vented to a baghouse and an incinerator in series.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
13.	The baghouse and incinerator shall not be bypassed during startup or for more than 4 hours during shutdown periods.	ADEM Admin. Code R. 335-3-1404(9)
		BACT
14.	Begin within one hour after the alarm on a bag leak detection system sounds, and complete in a timely manner, corrective	ADEM Admin. Code R. 335-3-1106(55)
	actions as specified in your operations, maintenance, and monitoring plan required by §63.1187 of 40 CFR 63 Subpart DDD.	[§63.1178(b)(1)]
15.	When the alarm on a bag leak detection system sounds for more than five percent of the total operating time in a six-	ADEM Admin. Code R. 335-3-1106(55)
	month reporting period, develop and implement a written quality improvement plan (QIP) consistent with the compliance assurance monitoring requirements of §64.8(b)–(d) of 40 CFR part 64.	[§63.1178(b)(2)]

Fe	derally Enforceable Provisos	Regulations
Co	mpliance and Performance Test Methods and Procedures	
1.	If testing is required, the nitrogen oxide (NO_x) emissions shall be determined by Methods 7, 7a, 7b, or 7e of 40 CFR 60, Appendix A.	ADEM Admin. Code R. 335-3-105
2.	If testing is required, the carbon monoxide (CO) emissions shall be determined by Methods 10 or 10b of 40 CFR 60, Appendix A.	ADEM Admin. Code R. 335-3-105
3.	If testing is required, particulate matter emissions shall be determined by Method 5e of 40 CFR Part 60, Appendix A.	ADEM Admin. Code R. 335-3-105
4.	If testing is required, the hydrogen sulfide emissions shall be determined by Method 11 of 40 CFR Part 60, Appendix A.	ADEM Admin. Code R. 335-3-105
5.	If testing is required, sulfur dioxide emissions shall be determined by Methods 6 or 6c of 40 CFR Part 60, Appendix A.	ADEM Admin. Code R. 335-3-105
6.	To comply with the PM standards of Subpart DDD, you must meet all of the following:	ADEM Admin. Code R. 335-3-1106(55)
		[§63.1181]
	(a) Install, adjust, maintain, and continuously operate a bag leak detection system for each fabric filter.	
	(b) Do a performance test as specified in §63.1188 of this subpart and show compliance with the PM emission limits while the bag leak detection system is installed, operational, and properly adjusted.	
	(c) Begin corrective actions specified in your operations, maintenance, and monitoring plan required by §63.1187 of this subpart within one hour after the alarm on a bag leak detection system sounds. Complete the corrective actions in a timely manner.	
	(d) Develop and implement a written QIP consistent with compliance assurance monitoring requirements of 40 CFR 64.8(b) through (d) when the alarm on a bag leak detection system sounds for more than five percent of the total operating time in a six-month reporting period.	
7.	The performance tests conducted to demonstrate compliance with the emissions limits in §63.1178 shall conform to the test methods and procedures specified in §63.1188 and §63.1189.	ADEM Admin. Code R. 335-3-1106(55)
	provide and desired and desired and desired	[§63.1188-1189]

[§63.1188-1189]

Fe	derally Enforceable Provisos	Regulations
8.	Using the results of the performance tests, the facility must use the following equation to determine compliance with the PM emission limit:	ADEM Admin. Code R. 335-3-1106(55) [§63.1190]
	$E = \frac{C \times Q \times K_1}{P}$	
	where:	
	E = Emission rate of PM, kg/Mg (lb/ton) of melt. C = Concentration of PM, g/dscm (gr/dscf). Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr). K ₁ = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr). P = Average melt rate, Mg/hr (ton/hr).	
En	nission Monitoring	
1.	Carbon Monoxide emission monitoring requirements under 40 CFR Part 64, "Compliance Assurance Monitoring" can be found in Appendix A.	40 CFR Part 64
2.	A monitoring device that continuously measures and records the firebox temperature of the incinerator on the cupola shall be installed, calibrated, maintained, and operated.	ADEM Admin. Code R. 335-3-104
3.	Instruments which measure the pressure drop across the filterhouses shall be maintained and operated.	ADEM Admin. Code R. 335-3-104
4.	Pressure drop across each filterhouse shall be monitored and recorded daily, except when the source of pollution to the filterhouse is not being operated.	ADEM Admin. Code R. 335-3-104
5.	Emissions tests on Stack 101 are to be conducted for the following pollutants at intervals not to exceed one year following the date of previous compliance testing. All test reports must be submitted to the Department within 15 days of completion of testing.	ADEM Admin. Code R. 335-3-104
	Particulate ⊠ Carbon Monoxide ⊠	
	Sulfur Dioxide ⊠	
6.	A bag leak detection system must meet the following requirements:	ADEM Admin. Code R. 335-3-1106(55) [§63.1184]

Regulations

- (a) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (b) The sensor on the bag leak detection system must provide output of relative PM emissions.
- (c) The bag leak detection system must have an alarm that will sound automatically when it detects an increase in relative PM emissions greater than a preset level.
- (d) The alarm must be located in an area where appropriate plant personnel will be able to hear it.
- (e) For a positive-pressure fabric filter, each compartment or cell must have a bag leak detector. For a negative-pressure or induced-air fabric filter, the bag leak detector must be installed downstream of the fabric filter. If multiple bag leak detectors are required (for either type of fabric filter), detectors may share the system instrumentation and alarm.
- (f) Each triboelectric bag leak detection system must be installed, operated, adjusted, and maintained so that it follows EPA's ``Fabric Filter Bag Leak Detection Guidance'' (EPA-454/R-98-015, September 1997). Other bag leak detection systems must be installed, operated, adjusted, and maintained so that they follow the manufacturer's written specifications and recommendations.
- (g) At a minimum, initial adjustment of the system must consist of establishing the baseline output in both of the following ways:
 - (1) Adjust the range and the averaging period of the device.
 - (2) Establish the alarm set points and the alarm delay time.

Regulations

- (h) After initial adjustment, the range, averaging period, alarm set points, or alarm delay time may not be adjusted except as specified in the operations, maintenance, and monitoring plan required by Sec. 63.1187 of this subpart. In no event may the range be increased by more than 100 percent or decreased by more than 50 percent over a 365 day period unless a responsible official as defined in Sec. 63.2 of the general provisions in subpart A of this part certifies in writing to the Administrator that the fabric filter has been inspected and found to be in good operating condition
- 7. The facility may change control device and process operating parameter levels established during performance tests and used to monitor compliance if you do the following:

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1186]

- (a) The facility must notify the Administrator of your desire to expand the range of a control device or process operating parameter level.
- (b) Upon approval from the Administrator, the facility must conduct additional performance tests at the proposed new control device or process operating parameter levels. Before operating at these levels, the performance test results must verify that, at the new levels, the facility comply with the emission limits in §§63.1178 and 63.1179 of subpart DDD.
- 8. The operations, maintenance, and monitoring plan must include the following:

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1187(b)]

- (a) Process and control device parameters the facility will monitor to determine compliance, along with established operating levels or ranges for each process or control device.
- (b) A monitoring schedule.
- (c) Procedures for properly operating and maintaining control devices used to meet the standards in §\$63.1178 and 63.1179 of this subpart. These procedures must include an inspection of each incinerator at least once per year. At a minimum, the facility must do the following as part of an incinerator inspection:

ally E	Enforceable Provisos	Regulations
(1)	Inspect all burners, pilot assemblies, and pilot sensing devices for proper operation. Clean pilot sensor if necessary.	
(2)	Ensure proper adjustment of combustion air, and adjust if necessary.	
(3)	Inspect, when possible, all internal structures (such as baffles) to ensure structural integrity per the design specifications.	
(4)	Inspect dampers, fans, and blowers for proper operation.	
(5)	Inspect motors for proper operation.	
(6)	Inspect, when possible, combustion chamber refractory lining. Clean, and repair or replace lining if necessary.	
(7)	Inspect incinerator shell for proper sealing, corrosion, and/or hot spots.	
(8)	For the burn cycle that follows the inspection, document that the incinerator is operating properly and make any necessary adjustments.	
(9)	Generally observe whether the equipment is maintained in good operating condition.	
(10	Complete all necessary repairs as soon as practicable.	
Pro	cedures for keeping records to document compliance.	
Pro) Complete all necessary repairs as soon as practicable.	

Recordkeeping and Reporting Requirements

performance testing.

1. Records shall be maintained of the sulfur content of the coke used in the cupola.

ADEM Admin. Code R. 335-3-1-.04

Regulations

A semi-annual monitoring report shall be submitted to the Department according the following schedule:

ADEM Admin. Code 335-3-16-.05(c)(3)

Reporting Period	Due Date
April 1 st to September 30 ^h	November 30 th
October 1st to March 31st	May 30 th

3. A report shall be submitted semi-annually which contains the following:

ADEM Admin. Code R.

ADEM Admin. Code R. 335-3-16-.05(c)2.(ii)

ADEM Admin. Code R.

ADEM Admin. Code R.

335-3-11-.06(55)

[§63.1191]

- (a) The periods when firebox temperature in the incinerator on the cupola was below 1320°F and the corrective action taken.
- (b) The periods when the pressure drops across the filterhouses were below the allowable minimum pressure.
- All record shall be maintained for a minimum of 5 years.
- This source shall comply with the notification requirements specified in 63.1191.
- 6. The facility must meet the following recordkeeping requirements:
- 335-3-11-.06(55) [§63.1192]
- (a) Maintain files of all information required by §63.10(b) of the general provisions in subpart A of this part, including all notifications and reports.
- (b) Maintain records of the following information also:
 - (1) Cupola production (melt) rate (Mg/hr (tons/hr) of melt).
 - (2) All bag leak detection system alarms. Include the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

335-3-16-.05(c)

Regulations

- (3) Incinerator operating temperature and results of incinerator inspections. For all periods when the average temperature in any three-hour block period fell below the average temperature established during the performance test, and all periods when the inspection identified incinerator components in need of repair or maintenance, include the date and time of the problem, when corrective actions were initiated, the cause of the problem, an explanation of the corrective actions taken, and when the cause of the problem was corrected.
- (c) Retain each record for at least five years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site.
- (d) Retain records on microfilm, on a computer, on computer disks, on magnetic tape disks, or on microfiche.
- (e) Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.
- 7. The facility must prepare and submit reports to the Administrator as required by this subpart and §63.10 of the general provisions in subpart A of this part. These reports include, but are not limited to, the following:
 - (a) A performance test report, as required by §63.10(d)(2) of the general provisions in subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.
 - (b) A startup, shutdown, and malfunction plan, as described in §63.6(e)(3) of the general provisions in subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by §63.6(e)(3), the r plan must include the following:
 - (1) Procedures to determine and record what caused the malfunction and when it began and ended.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1193]

Regulations

- (2) Corrective actions the facility will take if a process or control device malfunctions, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (3) An inspection and maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (c) A report of each event as required by §63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in §63.6(e)(3) of the general provisions in subpart A of this part.
- (d) An operations, maintenance, and monitoring plan as specified in §63.1187 of this subpart.
- (e) A semiannual report as required by §63.10(e)(3) of the general provisions in subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in §63.10(c) of the general provisions, as well as the relevant records required by §63.1192(b) of this subpart.
- (f) A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by §63.10(e)(3)(v) of the general provisions in subpart A of this part if no deviations have occurred.
- 8. Semi-annual monitoring report required by 40 CFR 63 Subpart DDD shall be submitted to the Department according the following schedule:

Reporting Period

Due Date

April 1st to September 30h

November 30th

October 1st to March 31st

May 30th

ADEM Admin. Code R. 335-3-11-.06(1) [§63.10(a)(5)]

Summary Page for Mineral Wool Process – Board Line

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
Stack 102 Filterhouse #3	PM	117 lb/hr*	335-3-1404(9)	
		117 10/111	BACT	
Stack 102	Filterhouse #3	CO	N/A	N/A
Stack 102	Filterhouse #3	NOx	N/A	N/A
Stack 102	Filterhouse #3	NH3	N/A	N/A
Stack 102	Filterhouse #3	Formaldehyde	0.06 lb/ton of melt	§63.1179(a) Subpart DDD

^{*}This limit is the combined particulate matter (PM) emissions from Cupola, Fiber Formation & Collection Process, Board Line, and Pipe Insulation Lines

Provisos for Mineral Wool Process – Board Line

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This unit is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. This unit has enforceable limits in place in order to comply with the applicable provisions of ADEM Admin. Code R. 335-3-1404. "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404
4. A mineral wool production facility is subject to the applicable provisions of 40 CFR 63 Subpart DDD, "National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production".	40 CFR 63 Subpart DDD
5. A mineral wool production facility is subject to the applicable provisions of 40 CFR 63 Subpart A, "General Provisions" as listed in Table 1 of 40 CFR 63 Subpart DDD.	40 CFR 63 Subpart DDD
Emission Standards	
1. Visible emissions (VE) these units shall not exceed the opacity limitations as specified in General Proviso No. 29.	ADEM Admin. Code R. 335-3-401(1)
2. The combined particulate matter (PM) emissions from the Cupola, Fiber Formation/Collection Process, Mineral Wool Process (Board Line), and Mineral Wool Process (Pipe Insulation Line) shall not exceed 117.0 (lb/hr) pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)
3. The facility must control emissions from each existing, new, or reconstructed curing oven by limiting emissions of formaldehyde to either of the following:	
(a) 0.03 kg of formaldehyde per MG (0.06 lb of formaldehyde per ton) of melt or less.	
(b) A reduction of uncontrolled formaldehyde emissions by at least 80 percent.	
4. The baghouse and incinerator shall not be bypassed during startup or for more than four (4) hours during shutdown periods.	ADEM Admin. Code 335-3-1404(9)

Regulations

5. The pressure drop across each baghouse shall not drop below 0.2 inches W. C. while the source of pollution to the baghouse is operating.

ADEM Admin. Code 335-3-14-.04(9)

6. Maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation at or below the specification ranges of the resin and binder used during the performance test.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1179(b)(1)]

7. Maintain the operating temperature of each incinerator so that the average operating temperature for each three-hour block period never falls below the average temperature established during the performance test.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1179(b)(2)]

8. The Permittee must comply with these standards (Subpart DDD) at all times except during periods of startup, shutdown, or malfunction.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1180]

9. The three-hour average temperature in the firebox of the afterburner on the curing oven shall not be less than 1200°F while the curing oven is operating.

ADEM Admin. Code 335-3-14-.04(9)

Compliance and Performance Test Methods and Procedures

ADEM Admin. Code R. 335-3-1-.05

1. If testing is required, particulate matter emissions shall be determined by Method 5e of 40 CFR Part 60, Appendix A.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1183]

- 2. To comply with the formaldehyde standards, the facility must meet all of the following:
 - (a) Install, calibrate, maintain, and operate a device that continuously measures the operating temperature in the firebox of each thermal incinerator.
 - (b) Do a performance test as specified in §63.1188 of this subpart while manufacturing the product that requires a binder formulation made with the resin containing the highest free-formaldehyde content specification range. Show compliance with the formaldehyde emission limits while the device for measuring incinerator operating temperature is installed, operational, and properly calibrated. Establish the average operating temperature as specified in §63.1185(a) of this subpart.
 - (c) During the performance test that uses the binder formulation made with the resin containing the highest free-formaldehyde content specification range, record the free-formaldehyde content specification range of the resin used, and the formulation of the binder used, including

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Regulations

the formaldehyde content and binder specification.

- (d) Following the performance test, monitor and record the free-formaldehyde content of each resin lot and the formulation of each batch of binder used, including the formaldehyde content.
- (e) Maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation at or below the specification ranges established during the performance test.
- (f) Following the performance test, measure and record the average operating temperature of the incinerator as specified in §63.1185(b) of this subpart.
- (g) Maintain the operating temperature of the incinerator so that the average operating temperature for each three-hour block period never falls below the average temperature established during the performance test.
- (h) Operate and maintain the incinerator as specified in your operations, maintenance, and monitoring plan required by §63.1187 of this subpart.
- (i) With prior approval from the Administrator, the facility may do short-term experimental production runs using resin where the free-formaldehyde content, or binder formulations where the formaldehyde content, is higher than the specification ranges of the resin and binder used during previous performance tests, or using experimental pollution prevention process modifications without first doing additional performance tests. Notification of intent to perform a short-term experimental production run must include the following information:
 - (1) The purpose of the experimental run.
 - (2) The affected production process.
 - (3) How the resin free-formaldehyde content or binder formulation will deviate from previously approved levels or what the experimental pollution prevention process modifications are.
 - (4) The duration of the experimental run.

Federally Enforceable Provisos	Regulations
(5) The date and time of the experimental run.	
(6) A description of any emissions testing to be done during the experimental run.	
3. The performance tests conducted to demonstrate compliance with the emissions limits in §63.1178 shall conform to the test methods and procedures specified in §63.1188 and §63.1189.	ADEM Admin. Code R. 335-3-1106(55) [§63.1188-1189]
4. Using the results of the performance tests, the facility must use the following equation to determine compliance with the formaldehyde numerical emission limits:	ADEM Admin. Code R. 335-3-1106(55) [§63.1190]
$E = \frac{C \times MW \times O \times K_1 \times K_2}{K_3 \times P \times 10^6}$	
where:	
E = Emission rate of measured pollutant, kg/Mg (lb/ton) of melt.	
C = Measured volume fraction of pollutant, ppm.	
MW = Molecular weight of measured pollutant, g/g-mole:	
Formaldehyde = 30.03.	
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).	
K_1 = Conversion factor, 1 kg/1,000 g (1 lb/453.6 g).	
K_2 = Conversion factor, 1,000 L/m ³ (28.3 L/ft ³).	
K₃= Conversion factor, 24.45 L/g-mole.	
P = Average melt rate, Mg/hr (ton/hr).	
Emission Monitoring	
1. A monitoring device that continuously measures and records the firebox temperature of the afterburner on the curing oven shall be installed, calibrated, maintained, and operated.	ADEM Admin. Code 335-3-1404(9)
2. Instruments which measure the pressure drop across the filterhouses shall be maintained and operated.	ADEM Admin. Code 335-3-104
3. Pressure drop across each filterhouse shall be monitored and recorded daily, except when the source of pollution to the filterhouse is not being operated.	ADEM Admin. Code 335-3-104

Federally Enforceable Provisos				Regulations
4.	An emissions test on Stack 102 is to be conducted for total PM at intervals not to exceed one year following the date of previous compliance testing. All test reports must be submitted to the Department within 15 days of completion of testing.			ADEM Admin. Code 335-3-104
5.	The following procedures must be done to establish the average operating temperature of the curing oven incinerator:			ADEM Admin. Code R. 335-3-1106(55) [§63.1185]
	(a)	the	ring the performance test, the facility must establish average operating temperature of an incinerator as ows:	
		(1)	Continuously measure the operating temperature of the incinerator.	
		(2)	Determine and record the average temperatures in consecutive 15-minute blocks.	
		(3)	Determine and record the arithmetic average of the recorded average temperatures measured in consecutive 15-minute blocks for each of the one-hour performance test runs.	
		(4)	Determine and record the arithmetic average of the three one-hour average temperatures during the performance test runs. The average of the three one-hour performance test runs establishes the temperature level to use to monitor compliance.	
	(b)	oper per ave req ave on ten is o	comply with the requirements for maintaining the erating temperature of an incinerator after the formance test, the facility must measure and record the erage operating temperature of the incinerator as uired by §§63.1182 and 63.1183 of this subpart. This erage operating temperature of the incinerator is based the arithmetic average of the one-hour average aperatures for each consecutive three-hour period and determined in the same manner described in paragraphs 1) through (a)(4) of this section.	
6.	para	ame	lity may change control device and process operating ter levels established during performance tests and monitor compliance if you do the following:	ADEM Admin. Code R. 335-3-1106(55) [§63.1186]
	(a)		e facility must notify the Administrator of your desire to band the range of a control device or process operating	

Federally Enforceable Provisos Regulations parameter level. (b) Upon approval from the Administrator, you must conduct additional performance tests at the proposed new control device or process operating parameter levels. Before operating at these levels, the performance test results must verify that, at the new levels, you comply with the emission limits in §§63.1178 and 63.1179 of this subpart. ADEM Admin. Code R. 7. The operations, maintenance, and monitoring plan must include the following: 335-3-11-.06(55) [§63.1187(b)] (a) Process and control device parameters you will monitor to determine compliance, along with established operating levels or ranges for each process or control device. (b) A monitoring schedule. (c) Procedures for properly operating and maintaining control devices used to meet the standards in §§63.1178 and 63.1179 of this subpart. These procedures must include an inspection of each incinerator at least once per year. At a minimum, you must do the following as part of an incinerator inspection: (1) Inspect all burners, pilot assemblies, and pilot sensing devices for proper operation. Clean pilot sensor if necessary. (2) Ensure proper adjustment of combustion air, and adjust if necessary. (3) Inspect, when possible, all internal structures (such as baffles) to ensure structural integrity per the design specifications. (4) Inspect dampers, fans, and blowers for proper operation. (5) Inspect motors for proper operation. (6) Inspect, when possible, combustion chamber refractory lining. Clean, and repair or replace lining if necessary.

(7) Inspect incinerator shell for proper sealing, corrosion,

and/or hot spots.

Federally Enforceable Provisos Regulations (8) For the burn cycle that follows the inspection, document that the incinerator is operating properly and make any necessary adjustments. (9) Generally observe whether the equipment is maintained in good operating condition. (10) Complete all necessary repairs as soon as practicable. (d) Procedures for keeping records to document compliance. (e) Corrective actions you will take if process or control device parameters vary from the levels established during performance testing. Recordkeeping and Reporting Requirements 1. A semi-annual monitoring report shall be submitted to the ADEM Admin. Code R. Department according the following schedule: 335-3-16-.05(c)3. **Reporting Period Due Date** April 1st to September 30h November 30th October 1st to March 31st May 30th 2. A report shall be submitted semi-annually which contains the ADEM Admin. Code R. following: 335-3-16-.05(c)3. (a) The periods when the temperature of the afterburner on the curing oven was below 1200 °F and the corrective action take; (b) The periods when the pressure drops across the filterhouses were below the minimum pressure determined during the annual stack tests; 3. All record shall be maintained for a minimum of 5 years. ADEM Admin. Code R. 335-3-16-.05(c)3. 4. This source shall comply with the notification requirements ADEM Admin. Code R. specified in 63.1191. 335-3-11-.06(55) [§63.1191]

5. The facility must meet the following recordkeeping

requirements:

ADEM Admin. Code R.

335-3-11-.06(55)

[§63.1192]

- (a) Maintain files of all information required by §63.10(b) of the general provisions in subpart A of this part, including all notifications and reports.
- (b) Maintain records of the following information also:
 - (1) All bag leak detection system alarms. Include the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.
 - (2) The free-formaldehyde content of each resin lot and the binder formulation, including formaldehyde content, of each binder batch used in the manufacture of bonded products.
 - (3) Incinerator operating temperature and results of incinerator inspections. For all periods when the average temperature in any three-hour block period fell below the average temperature established during the performance test, and all periods when the inspection identified incinerator components in need of repair or maintenance, include the date and time of the problem, when corrective actions were initiated, the cause of the problem, an explanation of the corrective actions taken, and when the cause of the problem was corrected.
- (c) Retain each record for at least five years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site.
- (d) Retain records on microfilm, on a computer, on computer disks, on magnetic tape disks, or on microfiche.
- (e) Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.
- 6. The facility must prepare and submit reports to the Administrator as required by this subpart and §63.10 of the general provisions in subpart A of this part. These reports include, but are not limited to, the following:
 - (a) A performance test report, as required by §63.10(d)(2) of

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1193]

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the general provisions in subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.

- (b) A startup, shutdown, and malfunction plan, as described in §63.6(e)(3) of the general provisions in subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by §63.6(e)(3), your plan must include the following:
 - (1) Procedures to determine and record what caused the malfunction and when it began and ended.
 - (2) Corrective actions you will take if a process or control device malfunctions, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
 - (3) An inspection and maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (c) A report of each event as required by §63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in §63.6(e)(3) of the general provisions in subpart A of this part.
- (d) An operations, maintenance, and monitoring plan as specified in §63.1187 of this subpart.
- (e) A semiannual report as required by §63.10(e)(3) of the general provisions in subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in §63.10(c) of the general provisions, as well as the relevant records required by §63.1192(b) of this subpart.

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- (f) A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by §63.10(e)(3)(v) of the general provisions in subpart A of this part if no deviations have occurred.
- 7. Semi-annual monitoring report required by 40 CFR 63 Subpart DDD shall be submitted to the Department according the following schedule:

ADEM Admin. Code R. 335-3-11-.06(1) [§63.10(a)(5)]

Reporting Period	Due Date
April 1 st to September 30 ^h	November 30 th
October 1st to March 31st	May 30 th

Summary Page for Mineral Wool Process – Eight (8) Pipe Insulation Lines

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
Stack 102	Filterhouse #2 and #3 controlling Lines D-3, SB-1, MK-2, A-1, B-1, D-	-1, MK-2, A-1, B-1, D-		335-3-1404(9)
	1, B-2, and B-3			BACT
Stack 102	Filterhouse #2 and #3 controlling Lines D-3, SB-1, MK-2, A-1, B-1, D- 1, B-2, and B-3	Formaldehyde	0.06 lb/ton of melt	§63.1179(a) Subpart DDD

^{*} combined particulate matter (PM) emissions from the Cupola, Fiber Formation/Collection Process, Mineral Wool Process (Board Line), and Mineral Wool Process (Pipe Insulation Line)

Provisos for Mineral Wool Process – Eight (8) Pipe Insulation Lines

Federally Enforceable Provisos	Regulations	
Applicability		
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603	
2. This process is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)	
3. This process has enforceable limits in place in order to comply with the applicable provisions of ADEM Admin. Code R. 335-3-1404. "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404	
4. A mineral wool production facility is subject to the applicable provisions of 40 CFR 63 Subpart DDD, "National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production".	40 CFR 63 Subpart DDD	
5. A mineral wool production facility is subject to the applicable provisions of 40 CFR 63 Subpart A, "General Provisons" as listed in Table 1 of 40 CFR 63 Subpart DDD.	40 CFR 63 Subpart DDD	
Emission Standards		
1. Visible emissions (VE) these units shall not exceed the opacity limitations as specified in General Proviso No. 29.	ADEM Admin. Code R. 335-3-401(1)	
2. The combined particulate matter (PM) emissions from the Cupola, Fiber Formation/Collection Process, Mineral Wool Process (Board Line), and Mineral Wool Process (Pipe Insulation Line) shall not exceed 117.0 (lb/hr) pounds per hour.	ADEM Admin. Code R. 335-3-1404(9)	
3. The facility must control emissions from each existing, new, or reconstructed curing oven by limiting emissions of formaldehyde to either of the following:		
(a) 0.03 kg of formaldehyde per MG (0.06 lb of formaldehyde per ton) of melt or less.		
(b) A reduction of uncontrolled formaldehyde emissions by at least 80 percent.		
4. The baghouse shall not be bypassed during startup or for more than four (4) hours during shutdown periods.	ADEM Admin. Code 335-3-1404(9)	

Federally Enforceable Provisos Regulations 5. The pressure drop across each baghouse shall not drop below Admin. Code ADEM 0.2 inches W. C. while the source of pollution to the baghouse 335-3-14-.04(9) is operating. 6. Maintain the free-formaldehyde content of each resin lot and ADEM Admin. Code R. the formaldehyde content of each binder formulation at or 335-3-11-.06(55) below the specification ranges of the resin and binder used [§63.1179(b)(1)] during the performance test. 7. The Permittee must comply with these standards (Subpart ADEM Admin. Code R. DDD) at all times except during perods of startup, shutdown, or 335-3-11-.06(55) malfunction. [§63.1180] Compliance and Performance Test Methods and Procedures 1. If testing is required, particulate matter emissions shall be ADEM Admin. Code R. determined by Method 5e of 40 CFR Part 60, Appendix A. 335-3-1-.05 2. To comply with the formaldehyde standards, the facility must ADEM Admin. Code R. meet all of the following: 335-3-11-.06(55) [§63.1183] (a) Install, calibrate, maintain, and operate a device that continuously measures the operating temperature in the firebox of each thermal incinerator. (b) Do a performance test as specified in §63.1188 of this subpart while manufacturing the product that requires a binder formulation made with the resin containing the highest free-formaldehyde content specification range. Show compliance with the formaldehyde emission limits while the device for measuring incinerator operating temperature is installed, operational, and properly calibrated. Establish the average operating temperature as specified in §63.1185(a) of this subpart. (c) During the performance test that uses the binder formulation made with the resin containing the highest free-formaldehyde content specification range, record the free-formaldehyde content specification range of the resin used, and the formulation of the binder used, including the formaldehyde content and binder specification. (d) Following the performance test, monitor and record the free-formaldehyde content of each resin lot and the formulation of each batch of binder used, including the formaldehyde content.

(e) Maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation

ra	lly Enforceable Provisos	Regulations
	at or below the specification ranges established during the performance test.	
(f)	Following the performance test, measure and record the average operating temperature of the incinerator as specified in §63.1185(b) of this subpart.	
(g)	Maintain the operating temperature of the incinerator so that the average operating temperature for each three-hour block period never falls below the average temperature established during the performance test.	
(h)	Operate and maintain the incinerator as specified in your operations, maintenance, and monitoring plan required by §63.1187 of this subpart.	
(i)	With prior approval from the Administrator, the facility may do short-term experimental production runs using resin where the free-formaldehyde content, or binder formulations where the formaldehyde content, is higher than the specification ranges of the resin and binder used during previous performance tests, or using experimental pollution prevention process modifications without first doing additional performance tests. Notification of intent to perform a short-term experimental production run must include the following information:	
	(1) The purpose of the experimental run.	
	(2) The affected production process.	
	(3) How the resin free-formaldehyde content or binder formulation will deviate from previously approved levels or what the experimental pollution prevention process modifications are.	
	(4) The duration of the experimental run.	
	(5) The date and time of the experimental run.	
	(6) A description of any emissions testing to be done	

3. The performance tests conducted to demonstrate compliance with the emissions limits in §63.1178 shall conform to the test methods and procedures specified in §63.1188 and §63.1189.

during the experimental run.

ADEM Admin. Code R. 335-3-11-.06(55) [§63.1188-1189]

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4.	Using the results of the performance tests, the facility must use the following equation to determine compliance with the formaldehyde numerical emission limits:	ADEM Admin. Code R. 335-3-1106(55) [§63.1190]
	$E = \frac{C \times MW \times O \times K_1 \times K_2}{K_3 \times P \times 10^6}$	
	where:	
	E = Emission rate of measured pollutant, kg/Mg (lb/ton) of melt.	
	C = Measured volume fraction of pollutant, ppm.	
	MW = Molecular weight of measured pollutant, g/g-mole:	
	Formaldehyde = 30.03.	
	Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).	
	K ₁ = Conversion factor, 1 kg/1,000 g (1 lb/453.6 g).	
	K ₂ = Conversion factor, 1,000 L/m ³ (28.3 L/ft ³).	
	K₃= Conversion factor, 24.45 L/g-mole.	
	P = Average melt rate, Mg/hr (ton/hr).	
<u>En</u>	nission Monitoring	
1.	Instruments which measure the pressure drop across the filterhouses shall be maintained and operated.	ADEM Admin. Code 335-3-104
2.	During the annual compliance test, minimum pressure drops shall be determined for the filterhouses.	ADEM Admin. Code 335-3-104
3.	Pressure drop across each filterhouse shall be monitored and recorded daily, except when the source of pollution to the filterhouse is not being operated.	ADEM Admin. Code 335-3-104
4.	Particulate matter emissions tests are to be conducted at intervals not to exceed one year following the date of initial compliance testing. All test reports must be submitted to the Department within 15 days of completion of testing.	ADEM Admin. Code 335-3-104

Fe	edera	illy I	Enforceable Provisos	Regulations	
5.			rations, maintenance, and monitoring plan must the following:	ADEM Admin. Code R. 335-3-1106 (55)	
	(a)	det	cess and control device parameters you will monitor to ermine compliance, along with established operating els or ranges for each process or control device.	[§63.1187(b)]	
	(b)	A n	nonitoring schedule.		
	(c)	dev 63. an a m	cedures for properly operating and maintaining control ices used to meet the standards in §§63.1178 and 1179 of this subpart. These procedures must include inspection of each incinerator at least once per year. At hinimum, you must do the following as part of an inerator inspection:		
		(1)	Inspect all burners, pilot assemblies, and pilot sensing devices for proper operation. Clean pilot sensor if necessary.		
		(2)	Ensure proper adjustment of combustion air, and adjust if necessary.		
		(3)	Inspect, when possible, all internal structures (such as baffles) to ensure structural integrity per the design specifications.		
		(4)	Inspect dampers, fans, and blowers for proper operation.		
		(5)	Inspect motors for proper operation.		
		(6)	Inspect, when possible, combustion chamber refractory lining. Clean, and repair or replace lining if necessary.		
		(7)	Inspect incinerator shell for proper sealing, corrosion, and/or hot spots.		
		(8)	For the burn cycle that follows the inspection, document that the incinerator is operating properly and make any necessary adjustments.		
		(9)	Generally observe whether the equipment is maintained in good operating condition.		
		(10	Complete all necessary repairs as soon as practicable.		

Federally Enforceable Provisos Regulations Procedures for keeping records to document compliance. (d) (e) Corrective actions you will take if process or control device parameters vary from the levels established during performance testing. Recordkeeping and Reporting Requirements 1. A semi-annual monitoring report shall be submitted to the ADEM Admin. Code R. Department according the following schedule: 335-3-16-.05(c)3. Reporting Period **Due Date** November 30th April 1st to September 30h October 1st to March 31st May 30th 2. A report shall be submitted semi-annually which contains the ADEM Admin. Code R. following: 335-3-16-.05(c)3. (a) The periods when the pressure drops across the filterhouses were below the allowable minimum pressure; 3. All records shall be maintained for a minimum of 5 years. ADEM Admin. Code R. 335-3-16-.05 (c)3. 4. This source shall comply with the notification requirements ADEM Admin. Code R. specified in 63.1191. 335-3-11-.06 (55) [§63.1191] 5. The facility must meet the following recordkeeping ADEM Admin. Code R. requirements: 335-3-11-.06 (55) (a) Maintain files of all information required by §63.10(b) of [§63.1192] the general provisions in subpart A of this part, including all notifications and reports. (b) Maintain records of the following information also: (1) All bag leak detection system alarms. Include the date

and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the

(2) The free-formaldehyde content of each resin lot and the binder formulation, including formaldehyde

content, of each binder batch used in the manufacture

alarm was corrected.

Fe	dera	lly Enforceable Provisos	Regulations
		of bonded products.	
	(c)	Retain each record for at least five years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site.	
	(d)	Retain records on microfilm, on a computer, on computer disks, on magnetic tape disks, or on microfiche.	
	(e)	Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.	
6.	Adn gen	facility must prepare and submit reports to the ninstrator as required by subpart DDD and §63.10 of the eral provisions in subpart A of this part. These reports ude, but not limited to, the following:	ADEM Admin. Code R. 335-3-1106 (55) [§63.1193]
	(a)	A performance test report, as required by §63.10(d)(2) of the general provisions in subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.	
	(b)	A startup, shutdown, and malfunction plan, as described in §63.6(e)(3) of the general provisions in subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by §63.6(e)(3), your plan must include the following:	
		(1) Procedures to determine and record what caused the malfunction and when it began and ended.	
		(2) Corrective actions you will take if a process or control	

device malfunctions, including procedures for

(3) An inspection and maintenance schedule for each

or minimize emissions.

recording the actions taken to correct the malfunction

process and control device that is consistent with the manufacturer's instructions and recommendations for

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routine and long-term maintenance.

- (c) A report of each event as required by §63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in §63.6(e)(3) of the general provisions in subpart A of this part.
- (d) An operations, maintenance, and monitoring plan as specified in §63.1187 of this subpart.
- (e) A semiannual report as required by §63.10(e)(3) of the general provisions in subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in §63.10(c) of the general provisions, as well as the relevant records required by §63.1192(b) of this subpart.
- (f) A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by §63.10(e)(3)(v) of the general provisions in subpart A of this part if no deviations have occurred.
- 7. Semi-annual monitoring report required by 40 CFR 63 Subpart DDD shall be submitted to the Department according the following schedule:

ADEM Admin. Code R. 335-3-11-.06(1) [§63.10(a)(5)]

Reporting Period	Due Date
April 1st to September 30h	November 30 th
October 1st to March 31st	May 30 th

APPENDIX A

40 CFR 64

Compliance Assurance Monitoring (CAM)

MONITORING APPROACH: Cupola Gas-fired Incinerator

	Indicator No. 1	Indicator No. 2
I. Indicator	Cupola Incinerator Temperature	Inspection and Maintenance Provisions
Measurement Approach	Cupola incinerator temperature will be monitored continuously when the cupola is in operation.	Follow procedures in section 63.1187(b)(3) of 40 CFR 63 Subpart DDD
II. Indicator Range	Cupola incinerator temperature will be maintained at or above 1320°F while the cupola is in operation (excludes startup and shutdown).	Follow procedures in section 63.1187(b)(3) of 40 CFR 63 Subpart DDD
III. Performance Criteria Data Representativeness	Cupola incinerator temperature will be monitored with a temperature indicating device installed in the combustion chamber of the incinerator, providing directly representative data.	Follow procedures in section 63.1187(b)(3) of 40 CFR 63 Subpart DDD
Verification of Operation Status	When operational, cupola incinerator temperature indicator will display the incinerator temperature.	Documented completion of inspection and maintenance activities in accordance with section 63.1187(b)(3) of 40 CFR 63 Subpart DDD
QA/QC Practices and Criteria	Cupola incinerator temperature will be automatically recorded.	Persons performing the inspection and maintenance will be trained in proper techniques and provided the proper background to effectively perform the inspection and maintenance
Monitoring Frequency	Cupola incinerator temperature is monitored continuously.	At least once per year
Data Collection Procedures	Automatic.	Records of completions of inspection and maintenance
Averaging period	3-hour average	N/A